

EXHIBIT I



575 5th Avenue, 14th Floor
New York, NY 10017

Max Rodriguez
max@maxrodriguez.law
T 646-741-5167

September 4, 2025

VIA FEDERAL EXPRESS AND EMAIL

Gideon Rapaport
1078 Summit Avenue, #627
Jersey City, NJ 07307
Email: gideonrapaportlaw@outlook.com

Re: *Rapaport v. Finkelman*, No. 1:24-cv-05942-JGLC

Dear Mr. Rapaport:

As you know, I represent Defendant Abigail Finkelman in the above-captioned action. As you also know, on August 29, 2025, Judge Clarke granted Ms. Finkelman's motion to dismiss in its entirety and with prejudice. *See* ECF no. 52. Judge Clarke also directed Ms. Finkelman to file a renewed motion for sanctions if she wishes by October 3, 2025 (extended from her original date of September 15). *See* ECF no. 54.

I write to provide notice that, on or before October 3, 2025, and most likely on September 26, 2025, Ms. Finkelman will file the enclosed motion for sanctions under Rule 11(c)(2).

There is no longer any ability to cure your sanctionable conduct, because despite unambiguous notice that your claims were frivolous, you refused to voluntarily dismiss them, forcing Ms. Finkelman to incur attorney's fees to vigorously defend herself, and Judge Clarke has now granted Ms. Finkelman's motion to dismiss in its entirety and with prejudice. If you wish to discuss this matter and explore potential resolution of Ms. Finkelman's outstanding statutory and procedural rights and claims against you¹, feel free to reach out to me by phone or email before September 26, 2025. Ms. Finkelman reserves all rights and remedies.

Sincerely,

/s/ Max Rodriguez

Max Rodriguez

Enclosure (Draft Notice of Renewed Motion for Sanctions, Draft Memorandum of Law in Support of Renewed Motion for Sanctions)

¹ In addition to her right to pursue an award of attorney's fees and costs under Rule 11, Ms. Finkelman is separately entitled to a mandatory award against you of attorney's fees and costs under New York's Anti-SLAPP law. *See* Civil Rights Law § 70-a(1)(a).